

SCANNED

DATE: 1-31-05

CMW

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

2005 JAN 31 A 8:43

ANTHONY BAYAD ,

U.S. DISTRICT COURT  
DISTRICT OF MASS.

Plaintiff ,

CIVIL ACTION

JOHN CHAMBERS, PATRICIA )  
RUSSO, ANTHONY )  
SAVASTANO and CARL )  
WIESE, )  
Defendants , )

CASE NO. 04-cv-10468-GAO

**NOTICE**

**OF ABUSE TACTICS AND DISOBEDIENCE OF RULE OF LAW**  
Federal Rule of Civil Procedure: 26, 33, 34, and 36

**TO :**

**Mark Chandlers lead counselor**  
**Robert J. Mathias Chairman**  
**Bruce E. Falby partner**  
**Robin Tarr partner**  
**Lisa Good Heart partner**  
**Firm of Piper Rudnick and Gray Cary**  
**One International Place,**  
**21<sup>st</sup> Floor Boston, MA 02110**

**Misconduct of Attorneys** as you (**Chandlers, Mathias, Falby, Tarr, and GoodHeart,**) shall not engage in conduct in connection of practice of law that is prejudicial to the administration of justice, include to knowingly or through callous indifference, disparage, humiliate, or discriminate against litigants as **Bayad Pro Se**, jurors, witness, court personnel, or other lawyers on any basis, include, but not limited to, **on account of race, ethnicity, gender, religion, national origin, disability, martial status, sexual orientation, age, socioeconomic status, employment, or physical characteristics;**

**You are prohibited** to obstruct a civil legal proceeding by altering evidence, evading legal process by destroying evidence in this proceeding. You have destroyed evidence once before and **now** you must refrain your self from destroying the **Cisco Sensitive List so called CISCO-NO-HIRE-LIST**, where Defendants posted or classified or announced Plaintiff Bayad ' name in this list, as follow : **DO NOT HIRE/PROMOTE/TRANSFER ANTHONY BAYAD EMPLOYEE ID#7399, SHOULD YOU HAVE QUESTION CONTACT TONY SAVASTANO ( defendant).**

**You are commended** by law to comply with the Federal Rules of Civil Procedure that [y]ou intentionally ignored in order to evade the answer of Plaintiff Request for admission to defendants Chambers , Wiese, and Savastano, as you are an attorneys and an officers of the Court and a Partner of a firm of revenue of 1 Billion dollars a year, the firm of **Piper Rudnick Gray Cary**; You must obey the Rule of Law and comply by the law of this Court , and to the instruction that plaintiff provided you in his request of admission to Defendants , which stated clearly that within the time provided for in **Rule 36, Fed. R. Civ. P.** and in accordance with said Rule ( **Rule 36**), you shall serve upon Plaintiff a written answer or objection addressed to each matter set forth under " **Request of Admission**" Every matter **not responded** to within the time ( **30 days and not 68 days** as you have done), provided for in **Rule 36, Fed. R. Civ. P., is admitted** as **you have failed** to comply with said rule and all your responses were **established** and **admitted** because of your failure to comply with the Rule of Law, as it is very offending to the Rule of Law and to this honorable Court; The fact show Plaintiff proceeding Pro Se have complied with all the request served by you and your Defendants, in accordance with said Rule. You must not forgot that you designed the discovery schedule without Plaintiff cons cent or involvement , and you introduced it surprisingly to Plaintiff and to the court at the Pretrial hearing , and you did not comply with your own discovery schedule and the time set forth in your own schedule discovery docketed before this Court . (it is a clear abuse of power)

**You have failed** to comply with the **Rule of Civil Procedure Rule 26 and 34**, which describe of disclosing documents or producing documents to other party ( as Bayad) , making them available for inspection and copying the documents that you intent to use at the trial or in this litigation or any other evidentiary materials you may have, and not protected by client attorney- privilege, or protected from disclosure; Intentionally you have failed to provide such documents to the plaintiff accordingly to said rules, and again **Plaintiff Bayad proceeding Pro Se** have complied fully with said Rule, by producing to you about 400 pages of Exhibits that plaintiff will use at the trial according to the 7<sup>th</sup> amendment of the constitution.

**You have failed to cooperate with Notice of Deposition** serve to you on December 13, 2004 , to provide the time and place of such meeting, knowingly Plaintiff provided you with a time notice of 60 days, and you failed to respond; Your argument or opinion in response to Depositions of Defendant as you made it very clear to Plaintiff Bayad , that you will not allow it to take place in this litigation because Plaintiff is Pro Se from Morocco, and you are ignoring the fact Plaintiff is an American and a citizen of this land as YOU and your Defendants; Additionally you are trying to send a message to other Defendants who will in future found them selves in Violation of people ' civil Rights set for by Congress in the U.S Constitution, as you made it clear that if you are a Defendant (as Chamber , Savastano, and Wiese) , you are Immune of any liability in any Federal Proceeding simply because you are a Managers or Executives of a Company and with the same Characteristics of a White person as Chambers, Savastano, and Wiese. Your misconduct in this litigation is **very offending to the Law** of This land and to this Honorable Court. There are no Rule of Law nor Memorandum of law in any Law library , nor in Case Law Research as Westlaw , or Lexus that evidence your opinion , and opinion of attorney as yours is not a records in Federal Court or any Federal Proceeding , then you must comply with law .

You must not take advantage of Plaintiff situation ( Pro Se), nor of his health, nor of his economical Status, nor of his race, and you must not ignore your legal duty and responsibility, as you should review the professional Ethics set forth by the Bar and the General Rule 11 of pleading in particular, was re-written in an effort to deter dilatory or abuse of tactics as yours and frivolous Motion as you are planning to introduce as a baseless Rule 56, knowingly Plaintiff provided you with **CONCRETE EVIDENCE** as there are uncounted genius issues that must be decided by Jury accordingly to the 7<sup>th</sup> amendment of our United States Constitution.

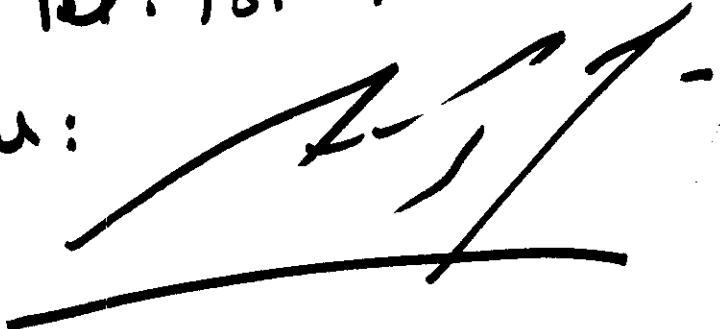
At this time you must stop interfering with Plaintiff Bayad ' right of due process, based upon the conduct exemplified in this litigation , you ( Chandlers, Mattias , falby, Tarr, and Goodheart) have not complied fully with the Rule of Law and you are offending the Rule of Law, by showing in the beginning of discovery issued that arises in this litigation is being incredible disobedience and contentions.

**CERTIFICATE OF SERVICE**

IT IS HEREBY CERTIFIED that a true and correct copy of Plaintiff  
**OF ABUSE TACTICS AND DISOBEDIENCE OF RULE OF LAW Federal Rule of Civil**  
**Procedure: 26, 33, 34, and 36** to Defendant Anthony Savastano was furnished via U.S. mail to : Bruce  
E.Falby, BBO #544143, PIPER RUDNICK LLP, One International Place, Boston MA 02110,  
this 31.day of January 2005

Anthony BAYHD  
2 MAGOUN Avenue  
Medford , MA 02155  
Tel : 781- 706- 8982

Signature :

A handwritten signature in black ink, appearing to read "A. BAYHD". The signature is fluid and cursive, with a large, stylized initial 'A'.